



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 28, 2025

Noelle Sanfilippo  
Regulatory Affairs Specialist  
Wellmark International  
1501 East Woodfield Road, 200W  
Schaumburg, Illinois 60173

Subject: Label Amendment - Registration Review Mitigation for Etofenprox  
Product Name: RF2181 KD A/T COMBO  
EPA Registration Number: 2724-826  
Application Date: May 9, 2024  
Decision Number: 595809

Dear Noelle Sanfilippo:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Etofenprox Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for

shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact DeMariah Koger by phone at (202)-566-2288 or via email at [koger.demariah@epa.gov](mailto:koger.demariah@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

ENCLOSURE: Stamped label

Text within braces { } denotes notes to reviewer.  
Text within brackets [ ] denotes optional language.  
Text within parentheses ( ) is meant to be included on the label

ETOFENPROX	GROUP	3A	INSECTICIDE
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## RF2181 KD A/T COMBO

{Text for "Dog" in the product name must be at least 75% of the size of the largest letter in the Brand Name}

**{Front panel -} For Use Only on Toy/Small (6-12 lbs.), Medium (13-31 lbs.), Large (32-79 lbs.) and Extra Large (80 lbs and over) Dogs/Puppies 10 weeks of age or older**

{A large clear picture of a dog in the weight range for the product as packaged will appear on the front panel of the label}

**[Flea & Tick [& Mosquito][Treatment] [and] Control]**

**[Spot-On Flea & Tick Control only for Toy/Small (6-12 lbs.), Medium (13-31 lbs.), Large (32-79 lbs.) and Extra Large (80 lbs and over) Dogs & Puppies 10 Weeks of age or older]**

### ACTIVE INGREDIENTS:

Etofenprox .....	30.0%
S-Methoprene .....	3.6%
Piperonyl Butoxide* .....	5.0%
<b>OTHER INGREDIENTS:</b> .....	61.4%
<b>TOTAL</b> .....	100.0%

\*(butylcarbityl) (6-propylpiperonyl) ether and related compounds

### KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for First Aid and Additional Precautionary Statements

{Net contents should include total package volume}

### NET CONTENTS:

{1, 3 or 4 applications:}

0.05 fl oz (1.5 cc) [tube][vial][cartridge] (Toy/Small Dogs, 6-12 lbs. and 10 weeks of age or older), Total Net Contents 0.05, {1 application} 0.15 {3 applications} or 0.20 fl oz, {4 applications}

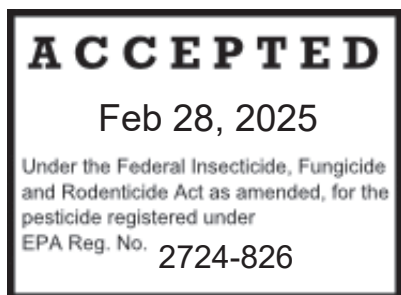
0.10 fl oz (3.0 cc [tube][vial][cartridge] (Medium Dogs, 13-31 lbs. and 10 weeks of age or older), Total Net Contents 0.10, {1 application} 0.30, {3 applications} or 0.40 fl. oz. {4 applications}

0.20 fl oz (6.0 cc) [tube][vial][cartridge] (Large Dogs, 32-79 lbs. and 10 weeks of age or older), Total Net Contents 0.20, {1 application} 0.60 {3 applications} or 0.80 fl. oz. {4 applications}

0.30 fl oz (9.0 cc) [tube][vial][cartridge] (Extra Large Dogs 80 lbs. and over and 10 weeks of age or older) Total Net Contents 0.30, {1 application} 0.90, {3 applications} or 1.20 fl. oz. {4 applications}

EPA Reg. No. 2724-826

EPA Est. No.



{1.5 cm X 1.5 cm cat prohibition icon will be in a box in lower right hand corner of front panel in yellow with black images}

## {SUBLABEL A – APPLICATOR DEVICE PACKAGE}

{Back Panel}

### 1. DIRECTIONS FOR USE WITH [APPLICATOR][DEVICE][APPLICATOR DEVICE]

#### **RF2181 KD A/T COMBO**

**IMPORTANT! DO NOT Use on Dogs/Puppies weighing less than [6 lbs.] [13] [32] [80] lbs and LESS THAN 10 Weeks OLD**

**READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS AND PUPPIES. DO NOT USE ON ANIMALS OTHER THAN DOGS!**

**DO NOT ALLOW CHILDREN TO APPLY PRODUCT.**

#### **INTRODUCTION:**

[RF2181 KD A/T COMBO ] prevents flea eggs from developing into adult fleas for [10 weeks][75 days][2.5 months]. RF2181 KD A/T COMBO also [kills fleas and ticks for [4 weeks][1 month][30 days]] [controls fleas and ticks for 1 month] and kills and repels mosquitoes for 4 weeks.]

Effective flea & tick control for your dog/puppy.

[RF2181 KD A/T COMBO] provides flea and tick protection for dogs/puppies for [30-days][1 month][4 weeks] – and protection from flea reinfestation for [75 days][2.5 months]. That's because it doesn't just kill adult fleas and ticks, it also prevents reinfestation on your dog/puppy by knocking out flea eggs and larvae that could hatch later on. Plus, it kills and repels mosquitoes.

The [RF2181 KD A/T COMBO] [Applicator][device][applicator device] is specially designed to make applying flea and tick control easier, more precise -- and neater -- than ever before. You simply insert the appropriate [RF2181 KD A/T COMBO] [tube] [vial][cartridge] for your dog/puppy into the [applicator][device][applicator device], close it and squeeze to apply. The [applicator's][device's][applicator device's] ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] dog's/puppy's hair to allow the liquid to more readily [better] reach [apply] the [to] [your dog's/puppy's] skin. The [tube] [vial][cartridge] is sealed inside, so you can be confident that the liquid goes onto your dog/puppy – and not your hand. Plus, if the [applicator][device][applicator device] is laid down on a table, counter or other flat surface, it won't run out or drip.

The RF2181 KD A/T COMBO provides a unique [applicator][device][applicator device] that allows dog/puppy owners to treat their dogs/puppies more securely, and dispose of liquid [cartridges] [tubes][vials]with less mess.

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply directly to dog without using the [applicator][device][applicator device], read and follow the Directions for Use For Direct Application to Dog on this package.]

#### **USE RESTRICTIONS:**

For indoor use only. Application of product on pets must only be done indoors. Apply this product once every [30 days][1 month][4 weeks] . \*\*If necessary for heavy infestation, product can be reapplied at 8 or more days after the initial application but do not retreat more than once per [month][30 days][4 weeks]. Do not apply more than one [vial] [tube][cartridge] per treatment on dog regardless of the dog's weight. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than [6][13][32][80] lbs and less than 10 weeks old .

RF2181 KD A/T COMBO works by application directly to the dog's/puppy's skin, not to the hair. When applying, use [applicator][device][applicator device] tip to push aside dog's/puppy's hair to allow direct application to the skin.

{Note: Each package contains sufficient [tubes][vials]cartridges} for {# – depending on package size} applications}

#### **{DFU Set No. 1}**

**FOR [TOY/SMALL][MEDIUM] DOGS/PUPPIES weighing [6-12 lb][13-31 lb] and 10 weeks of age or older**

**To apply the [RF2181 KD A/T COMBO ] treatment, use one disposable liquid [cartridge] [tube][vial][for each application] with the [applicator][device][applicator device].**

{bullets may be used instead of numbers}

1. OPEN [icon]{see pgs 7-9 for icon options}

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] {see pgs 7-9 for icon options}{2 alternate statements}

-[To Load, place [tube] [cartridge][vial] white side up into the open [applicator][device][applicator device] with front of [tube][vial][cartridge] placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] [applicator][device][applicator device] with tip end of [tube][vial][cartridge] placed under [color][U-shaped] tab on door]

[Ensure that [tube] [cartridge][vial] fits securely in the [applicator][device][applicator device].]

3. CLOSE [icon] {see pgs 7-9 for icon options}

Gently close the [color, e.g. green] door [and] the [tube][vial][cartridge] will snap open.

4. APPLY [icon] {see pgs 7-9 for icon options}

The dog/puppy must be dry and standing for application. Dog/puppy should remain dry for 24 hours after application. To apply, use [front edge of [applicator][device][applicator device]] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number-once] at each of [two] {Toy/Small dogs/puppies} [three] {Medium dogs/puppies} evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon] {see pgs 7-9 for icon options}

[When finished, hold [applicator] [device][applicator device] over trash.] To dispose of empty [tube][vial][cartridge], open [color, e.g. green] door and drop empty [tube][vial][cartridge] into trash or offer for recycling if available. Close [applicator] [device][applicator device] door and store in original package.

6. RETREATMENT [REAPPLICATION] {2 Alt. statements}

- [\*\*Do not reapply product for [30 days][1 month][4 weeks] unless re-treatment is required for heavy infestation, but not sooner than 8 days after the initial treatment. Do not retreat more than once per [month][30 days][4 weeks].]

- [\*\*If necessary for heavy infestation, product can be reapplied, but not sooner than 8 days after the initial treatment. Do not retreat more than once per [month][30 days][4 weeks].]

{Note: Each package contains sufficient [cartridges][tubes][vials] for [1, 3 or 4 {-depending on package size} applications}

**FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES weighing [32-79 lb][80 lb and over] and 10 weeks of age or older**

{bullets may be used instead of numbers}

- 1 {Same as above}
- 2 {Same as above}
- 3 {Same as above}

4 APPLY [icon] {see pgs 7-9 for icon options}

The dog/puppy must be dry and standing for application. Dog/puppy should remain dry for 24 hours after application. To apply, use [front edge of [applicator][device][applicator device]][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-once] at each of four or five evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5 {Same as above}

6 {Same as above}

{Note: Each package contains sufficient [cartridges][tubes][vials] for [1, 3 or 4 depending on package size] applications}

RF2181 KD A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. [Monthly][30 day][4 week] treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2181 KD A/T COMBO kills fleas that may cause FAD.] [RF2181 KD A/T COMBO is water resistant after 24 hours from treatment and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every [30 days][1 month][4 weeks] per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date ([30 Days][1 month][4 weeks] From 1 <sup>st</sup> )	Third Treatment Date ([30 Days][1 month][4 weeks] From 2 <sup>nd</sup> )

Reminder: I purchased RF2181 KD A/T COMBO from: \_\_\_\_\_

NOTES: \_\_\_\_\_

Treatment table can be expanded based on package size. (6 months)]

**STORAGE and DISPOSAL:** . **Pesticide Storage:** Store [tubes][vials][cartridges] together in a cool area away from children and animals. Liquid [Cartridge] [vial][tube] **Pesticide Disposal and Container Handling:** Do not reuse [cartridge] [vial] [tube]. **If empty:** Place in trash or offer for recycling if available. **If partially filled:** Do not pour or dispose down the drain or sewer. Call your local solid waste agency for local disposal options.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS & DOMESTIC ANIMALS - CAUTION:

**HAZARDS TO HUMANS:** Causes moderate eye irritation. Avoid contact with eyes or clothing.

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to Etofenprox can cause skin irritation.

**HAZARDS TO ANIMALS: DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR WEIGHING LESS THAN [6][13][32][80] {as appropriate for package size} lbs.** For external use only.

Consult a veterinarian before using this product on debilitated, aged, pregnant, or nursing dogs. Certain medications can interact with pesticides. This product is not a substitute for prescribed heartworm preventative. Consult a veterinarian before using on medicated dogs. Sensitivities may occur after using ANY pesticide product for dogs. Some sensitive dogs may experience temporary skin irritation such as itching or redness at the application site. If signs of sensitivity occur, bathe your dog/puppy with mild soap and rinse with large amounts of water.

If signs persist or become more severe, call 1-800-brand phone number or contact your veterinarian immediately.

#### FIRST AID

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after first 5 minutes, then continue rinsing</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
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Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents) you may call 1-888-987-4410, 24 hours/day, 7 days/week..

**{A box labeled Side Effects will appear immediately above the cat warning box on the back panel.}**

**SIDE EFFECTS:** Monitor your dog/puppy after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or Wellmark at 1-800-234-2269.



#### DO NOT USE ON CATS.

Keep cats away from treated dogs/puppies for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.

**{a 1.5 cm X 1.5 cm cat prohibition icon and warning text in a box will be located at the lower right hand corner of the back panel in yellow with black images and text.}**

#### WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.



In case of emergency or for product information, call 1-800-243-2269 or contact your veterinarian if your pet is experiencing an adverse event.

[Manufactured for]  
Wellmark International  
1501 E. Woodfield Road 200W  
Schaumburg, Illinois 60173  
[www.adamspetcare.com]  
Made in USA

{TEXT FOR LIQUID [TUBE][CARTRIDGE][VIAL]}{applies to all sublabels}

[Product name]  
Etofenprox 30%, (S)-Methoprene 3.6%, Piperonyl Butoxide 5%

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ ENTIRE LABEL BEFORE USING

EPA Reg. No. 2724-826

Net Contents

0.05 fl oz (1.5 mL) [Applicator] [tube][vial] {Toy/Small Dogs}  
0.10 fl oz (3.0 mL) [Applicator] [tube][vial] {Medium Dogs}  
0.20 fl oz (6.0 mL) [Applicator] [tube][vial] {Large Dogs}  
0.30 fl oz (9.0 mL) [Applicator] [tube][vial] {Extra Large Dogs}

**For Use Only on Toy/Small (6-12 lbs.), Medium (13-31 lbs.), Large (32-79 lbs.), and Extra Large (80 lbs. and over) Dogs/Puppies 10 Weeks of age or older**



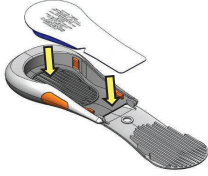
{Lot number}



Alternate Sets of ICONS for the RF2181 KD A/T COMBO

**[ICON SET 1]**  
**[OPEN]**

**[LOAD]**



**[CLOSE]**



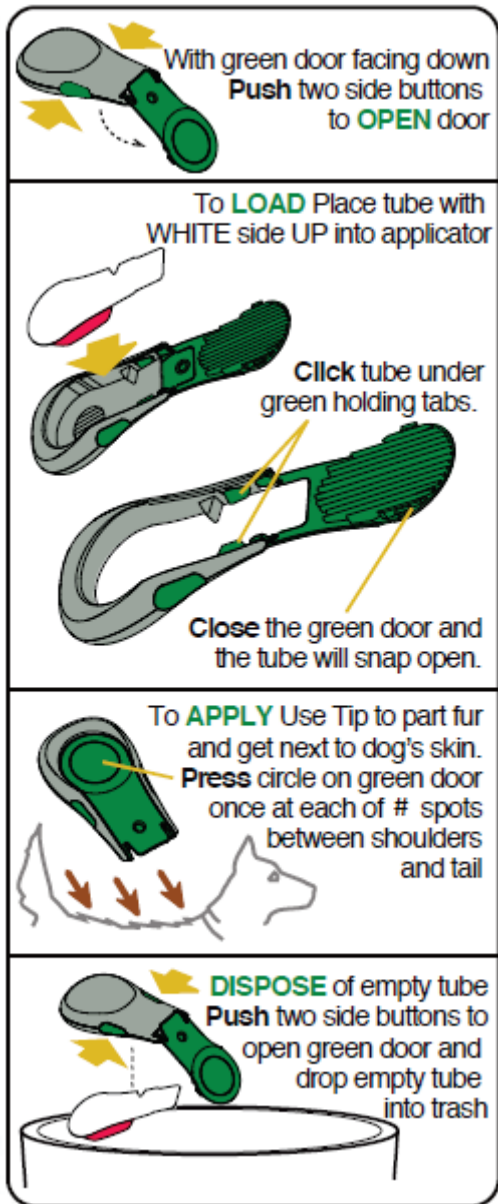
**[APPLY]**



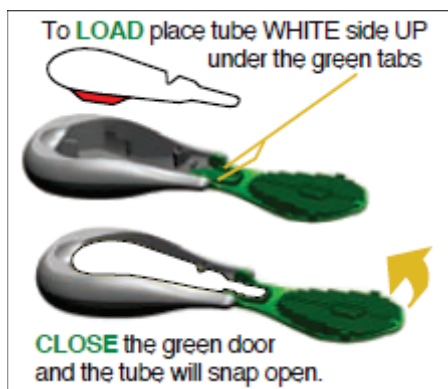
**[DISPOSE]**



**[ICON SET 2] ALTERNATE ICONS FOR DIRECTIONS FOR USE** (will be specific to dog's/puppy's size)



("#Spots" is a variable dependent on size)  
Door color may change based on brand.  
(Alternate LOAD icon)



[ICON SET 3] ALTERNATE ICONS FOR DIRECTIONS FOR USE (will be specific to dog's/puppy's size)



("#Spots" is a variable dependent on size)  
Door color may change based on brand.

**{DFU Set No. 2} DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY**

**{Back panel}**

**IMPORTANT! DO NOT Use on Dogs/Puppies weighing less than [6 lbs.] [13] [32] [80] lbs and LESS THAN 10 Weeks OLD**

**READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS AND PUPPIES. DO NOT USE ON ANIMALS OTHER THAN DOGS!**

**DO NOT ALLOW CHILDREN TO APPLY PRODUCT.**

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

**USE RESTRICTIONS:**

For indoor use only. Application of product on pets must only be done indoors. Apply this product once every [30 days][1 month][4 weeks]. \*If necessary for heavy infestation, product can be reapplied at 8 or more days after the initial application but do not retreat more than once per [month][30 days][4 weeks]. Do not apply more than one [vial][tube][cartridge] per treatment on dog regardless of the dog's weight. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than [6][13][32][80] lbs and less than 10 weeks old .

RF2181 KD A/T COMBO works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

{Note: Each package contains sufficient [tubes][vials][cartridges] for [1, 3 or 4 {#-depending on package size}} applications}}

{bullets may be used instead of numbers}

**FOR [TOY/SMALL][MEDIUM] DOGS/PUPPIES weighing [6-12 lb][13-31 lb] and 10 weeks of age or older**

1. [Bend at perforation and tear off first [tube][vial]cartridge].]
2. [Hold [tube][vial][cartridge][and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [vial][cartridge] upright and snap tip back, away from face and body.
3. The dog/puppy should be dry and standing for easy application. Dog/puppy should remain dry for 24 hours after application. Apply RF2181 KD A/T COMBO evenly to [two spots]{toy/small dogs/puppies}[three spots]{medium dogs/puppies} on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the [tube][vial][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube] [vial][cartridge] as described in Storage and Disposal.
6. \*\*Do not reapply product for [30 days][1 month][4 weeks] unless re-treatment is required for heavy infestation, but not sooner than 8 days after the initial treatment. Do not retreat more than once per [month][30 days][4 weeks].

{Note: Each package contains sufficient [tubes][vials][cartridges] for [1, 3 or 4 {#-depending on package size}} applications}}

**FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES weighing [32-79 lb][80 lb and over] and 10 weeks of age or older**

1. [Bend at perforation and tear off first [tube][vial][cartridge].]
2. [Hold [tube][vial][cartridge] [and bend area of plastic at perforation, tear off and discard.]]  
Hold [tube][vial][cartridge] upright and snap tip back, away from face and body
3. The dog/puppy should be dry and standing for easy application. Dog/puppy should remain dry for 24 hours after application. Apply RF2181 KD A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the [tube][vial][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube] [vial][cartridge] as described in Storage and Disposal.
6. \*\*Do not reapply product for [30 days][1 month][4 weeks] unless re-treatment is required for heavy infestation, but not sooner than 8 days after the initial treatment. Do not retreat more than once per [month][30 days][4 weeks].

{Note: Each package contains sufficient [tubes][vials][cartridges] for [1, 3 or 4 {#-depending on package size}} applications}}

RF2181 KD A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name ] products registered for residential area control of these pests in conjunction with this treatment. [Monthly][30 day][4 week] treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2181 KD A/T COMBO kills fleas that may cause FAD.] [RF2181 KD A/T COMBO is water resistant after 24 hours from treatment and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every [30 days][1 month][4 weeks] per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date ([30 Days][1 month][4 weeks] From 1 <sup>st</sup> )	Third Treatment Date ([30 Days][1 month][4 weeks] From 2 <sup>nd</sup> )

Reminder: I purchased RF2181 KD A/T COMBO from: \_\_\_\_\_

NOTES: \_\_\_\_\_

Treatment table can be expanded based on package size. (6 months)]

## SUB-LABEL B FOR REFILL PACKAGE

{For use with [applicator][device][applicator device] or direct application to dog/puppy without [applicator][device][applicator device]}

ETOFENPROX	GROUP	3A	INSECTICIDE
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{Text for "Dog" in the product name must be at least 75% of the size of the largest letter in the Brand Name}

{Front Panel}

[Product Name]

**{Front panel} - For Use Only on Toy/Small (6-12 lbs.), Medium (13-31 lbs.), Large (32-79 lbs.) and Extra Large (80 lbs and over) Dogs/Puppies 10 weeks of age or older**

A large clear picture of a dog in the weight range for the product as packaged will appear on the front panel of the label}

**[Flea & Tick [& Mosquito][Treatment] [and] Control]**

**[Spot-On Flea & Tick Control only for Toy/Small (6-12 lbs.), Medium (13-31 lbs.), Large (32-79 lbs.) and Extra Large (80 lbs and over) Dogs/Puppies 10 weeks of age or older]**

### ACTIVE INGREDIENTS:

Etofenprox .....30.0%

S-Methoprene ..... 3.6%

Piperonyl Butoxide\* ..... 5.0%

**OTHER INGREDIENTS:** .....61.4%

**TOTAL** ..... 100.0%

\*(butylcarbityl) (6-propylpiperonyl) ether and related compounds

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See Back Panel for First Aid and Additional Precautionary Statements

EPA Reg. No. 2724-826

EPA Est No.

{Net contents should include total package volume}

**NET CONTENTS:** :

{1, 3 or 4 applications:}

0.05 fl oz (1.5 cc) [tube][vial][cartridge] (Toy/Small Dogs, 6-12 lbs. and 10 weeks of age or older), Total Net Contents 0.05, {1 application} 0.15 {3 applications} or 0.20 fl oz, {4 applications}

0.10 fl oz (3.0 cc [tube][vial][cartridge] (Medium Dogs, 13-31 lbs. and 10 weeks of age or older), Total Net Contents 0.10, {1 application} 0.30, {3 applications} or 0.40 fl. oz. {4 applications}

0.20 fl oz (6.0 cc) [tube][vial][cartridge] (Large Dogs, 32-79 lbs. and 10 weeks of age or older), Total Net Contents 0.20, {1 application} 0.60 {3 applications} or 0.80 fl. oz. {4 applications}

0.30 fl oz (9.0 cc) [tube][vial][cartridge] (Extra Large Dogs 80 lbs. and over and 10 weeks of age or older) Total Net Contents 0.30, {1 application} 0.90, {3 applications} or 1.20 fl. oz. {4 applications}



{1.5 cm X 1.5 cm cat prohibition icon will be in a box in lower right hand corner of front panel in yellow with black images}

**{Back Panel}**

**IMPORTANT! DO NOT Use on Dogs/Puppies weighing less than [6 lbs.] [13] [32] [80] lbs and LESS THAN 10 Weeks OLD**

**READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE ON ANIMALS OTHER THAN DOGS! DO NOT ALLOW CHILDREN TO APPLY PRODUCT.**

[RF2181 KD A/T COMBO] prevents flea eggs from developing into adult fleas for [10 weeks] [75 days][2.5 months]. RF2181 KD A/T COMBO also kills fleas and ticks for [4 weeks][1 month][30 days] and kills and repels mosquitoes for 4 weeks.]

[Effective flea & tick control for your dog/puppy.

[RF2181 KD A/T COMBO] provides flea and tick protection for dogs/puppies for [30-days][1 month][4 weeks] – and protection from flea reinfestation for [75 days][2.5 months]. That's because it doesn't just kill adult fleas and ticks, it also prevents reinfestation on your dog/puppy by knocking out flea eggs and larvae that could hatch later on. Plus, it kills and repels mosquitoes.]

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

[To apply the RF2181 KD A/T COMBO treatment with the [RF2181 KD A/T COMBO] [applicator][device][applicator device], use one disposable liquid [cartridge] [tube][vial][for each application] with the [applicator] [device][applicator device].]

[Remove one refill [tube] [cartridge][vial] from the package and insert into opened [RF2181 KD A/T COMBO] [applicator] [device][applicator device]. Make application according to label directions supplied with the [brand name] [applicator] [device][applicator device].] If you need directions for application, please call 1-800-234-2269]

[However, if you choose to apply directly to dog/puppy without using the [applicator] [device][applicator device], read and follow the Directions for Use For Direct Application to Dog /Puppy on this package.]

**[DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY]**

**USE RESTRICTIONS:**

For indoor use only. Application of product on pets must only be done indoors. Apply this product once every [30 days][1 month][4 weeks]. \*\*If necessary for heavy infestation, product can be reapplied at 8 or more days after the initial application but do not retreat more than once per [month][30 days][4 weeks]. Do not apply more than one [vial] [tube][cartridge] per treatment on dog regardless of the dog's weight. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than [6][13][32][80] lbs and less than 10 weeks old .

RF2181 KD A/T COMBO works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin. Do not get this product in dog's/puppy's eyes or mouth.



{Note: Each package contains sufficient [tubes][vials][cartridges] for [1, 3 or 4 {#-depending on package size}] applications}}

{bullets may be used instead of numbers}

**FOR [TOY/SMALL][MEDIUM] DOGS/PUPPIES weighing [6-12 lb][13-31 lb] and 10 weeks of age or older**

1. [Bend at perforation and tear off first [tube][vial][cartridge].]
2. [Hold [tube][vial][cartridge] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [vial][cartridge] upright and snap tip back, away from face and body.
3. The dog/puppy should be dry and standing for easy application. Dog/puppy should remain dry for 24 hours after application. Apply RF2181 KD A/T COMBO evenly to [two spots]{toy/small dogs/puppies}[three spots]{medium dogs/puppies} on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the [tube][vial][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube][vial][cartridge] as described in Storage and Disposal.
6. \*\*Do not reapply product for [30 days][1 month][4 weeks] unless re-treatment is required for heavy infestation, but not sooner than 8 days after the initial treatment. Do not retreat more than once per [month][30 days][4 weeks].

{Note: Each package contains sufficient tubes/applicators for [1, 3 or 4 depending on package size] applications}

**FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES weighing [32-79 lb][80 lb and over] and 10 weeks of age or older**

1. [Bend at perforation and tear off first [tube] [vial][cartridge].]
2. [Hold [tube] [vial][cartridge] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [vial][cartridge] upright and snap tip back, away from face and body
3. The dog/puppy should be dry and standing for easy application. Dog/puppy should remain dry for 24 hours after application. Apply RF2181 KD A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the [tube] [vial][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube] [vial][cartridge] as described in Storage and Disposal.
6. \*\*Do not reapply product for [30 days][1 month][4 weeks] unless re-treatment is required for heavy infestation, but not sooner than 8 days after the initial treatment. Do not retreat more than once per [month][30 days][4 weeks].

RF2181 KD A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. [Monthly][30 day][4 week] treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2181 KD A/T COMBO kills fleas that may cause FAD.] [RF2181 KD A/T COMBO is water resistant after 24 hours from treatment and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE Dosage: 1 [cartridge] [tube][vial] every [30 days][1 month][4 weeks] per dog/puppy]			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date ([30 Days][1 month][4 weeks] From 1 <sup>st</sup> )	Third Treatment Date ([30 Days][1 month][4 weeks] From 2 <sup>nd</sup> )

Reminder: I purchased RF2181 KD A/T COMBO from: \_\_\_\_\_

NOTES: \_\_\_\_\_

Treatment table can be expanded based on package size. (6 months)]

**{Precautionary/First Aid and Storage/Disposal} text as shown in Sublabel A included}**

#### **WARRANTY AND CONDITIONS OF SALE:**

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-234-2269 [or contact your veterinarian if your pet is experiencing an adverse event].

[Manufactured for]  
Wellmark International  
1501 East Woodfield Road 200W  
Schaumburg, Illinois 60173

{Individual tubes will have the same information as on Sublabel A}

**General Claims:**

Effective on indoor and outdoor dogs/puppies  
([1][3][4] monthly treatments) [1][3][4] Months  
Every [30 days][1 month][4 weeks] logo  
Spreads with dog's/puppy's movement [skin and hair oils]  
[Formula][Contains lanolin for coat conditioning]  
Keeps killing fleas and ticks in humid and wet conditions  
[Kills Fleas and Ticks by Contact]  
[Fresh][Clean][Scent][Smell]  
[Reapply monthly][Reapply every 30 days][Reapply every 4 weeks]  
[Suitable for year-round use][Month][30 days][4 weeks] sticker for home calendar  
Satisfaction guaranteed or your money back  
Patent Pending

**Efficacy Claims:**

Each tube [cartridge][vial] [application] [kills and repels mosquitoes for 4 weeks]  
Aids in Control of Ticks for [30 days][1 month][4 weeks]  
Kills Brown Dog Ticks for [30 days][1 month][4 weeks]  
Kills Deer Ticks [that may carry Lyme disease][for][30 days][1 month][4 weeks][on dogs]  
Kills Fleas [that may transmit tapeworm][for][30 days][1 month][4 weeks][on dogs]  
Kills fleas that may cause flea allergy dermatitis [and flea bite anemia][for][30 days][1 month][4 weeks][on dogs]  
Prevents flea eggs from developing into biting adults for [30 days][1 month][4 weeks]  
Protects for [Four/4] Weeks [One month][30 days]  
Controls fleas, ticks and mosquitoes for [one month][30 days][4 weeks]  
[Four/4 Week][1 month][30 days] [Flea][Tick][Mosquito] Treatment  
[Monthly][30 day][4 week] treatment for control of fleas, ticks and mosquitoes  
Dual Action kills adult fleas and prevents flea development  
Kills fleas, ticks, mosquitoes, flea eggs and flea larvae  
Dual protection [against fleas and ticks]  
For the treatment of adult ticks, tick nymphs and tick larvae of the *Rhipicephalus sanguineus* (Brown dog tick) which [can][may][carry][transmit] Rocky Mountain Spotted Fever and Ehrlichiosis.  
For the treatment and control of adult fleas, flea eggs, flea larvae, ticks, tick nymphs, tick larvae [immature ticks], and mosquitoes in dogs 10 weeks of age and older  
Kills fleas, flea eggs, flea larvae, ticks, tick nymphs, tick larvae [immature ticks], and mosquitoes  
Kills [Brown dog] [tick nymphs][and][kills][tick larvae][to prevent them from growing up into [biting, breeding] adults]  
Kills all stages of the [flea] [and] [tick] life cycle(s)  
Breaks the [flea] [and] [tick] life cycle(s)  
Kills all biting stages of ticks  
Kills [tick nymphs][and][kills][tick larvae]  
Kills adult [brown dog] ticks, nymphs and larvae  
Kills the Deer Tick, which may transmit Lyme Disease  
Kills and Repels mosquitoes [that may carry heartworm disease]  
[Monthly][30 day][4 week] application for most effective protection on your dog/puppy  
Prevents [and controls] re-infestation(s) on your dog/puppy  
Kills fleas before they have a chance to lay eggs

**IGR Claims:**

[Contains [\*\*\*InfestStop™] an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [10 weeks] [75 days][2.5 months]]

[Contains [\*\*\*InfestStop™] [an Insect Growth Regulator (IGR) to kill flea eggs and larvae]

[Breaks Flea Life Cycle [for][10 weeks] [75 days][2.5 months]

An important step in breaking the flea life cycle

[Controls flea reinfestation for [10 weeks] [75 days][2.5 months]

[With [\*\*\*InfestStop™][S-Methoprene] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

\*InfestStop/\*Infestop™ logo

Prevents flea eggs from hatching

Prevents flea eggs from developing into biting adults [for][30 days][1 month][4 weeks]

\*\*\*[S]-Methoprene (must occur on same panel wherever \*\*\*InfestStop™ is used)

**Applicator name options {only one option will be used consistently in text}**

Applicator

Device

Applicator Device

**Thermoform name options {only one option will be used consistently in text}**

Cartridge

Tube

Vial

**Applicator Claims**

Contemporary design

[brand name] [Applicator] [device][applicator device] helps to prevent getting liquid on [your] hands

Helps keep liquid off hands

[brand name] [Applicator] [device][applicator device] tip parts hair to help [liquid][application] get down to [the][your][dog's/puppy's] skin

Tip parts hair

Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]

For use with [only][brand name][disposable][liquid dispensing] tubes [vials] [cartridges]

[brand name] [applicator] [device][applicator device] [has][provides][allows for][delivers] better grip

[brand name][provides] re-closable [re-sealable] packaging for [easy] storage

Closing [the][brand name][applicator] [device][applicator device] door automatically opens the [disposable][liquid dispensing] [tube] [vial][cartridge]

[brand name] [Applicator] [device][applicator device] [will not drip after opening]

[brand name] [Applicator] [device][applicator device] Won't drip when set down as you go fetch the [your] dog/puppy

Includes unique [brand] [applicator] [device][applicator device]

Includes reusable [applicator] [device][applicator device]

Puts the liquid on your dog/puppy – not your hands

Directs the liquid onto your dog [/puppy] – not your hands

Directs the liquid onto your dog [/puppy] – away from your hands

Applies liquid to your dog's [/puppy's] skin – not yours

Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong dog/puppy

Convenient, easy to use ACCU-TIP [Applicator][device][applicator device]

[Easy to use] Longer [applicator][device][applicator device] tip for easy application to long-haired dogs/puppies

**Thermoform claims**

[disposable][liquid dispensing] [tube] [cartridge][vial]

{Note tube/vial/cartridge used interchangeably and only one will be used throughout the label}

[brand name][disposable][liquid dispensing] [tube][vial][cartridge] tip [helps][to] spread out liquid [on your][dog/puppy]

Unique [cartridge] [tube][vial] with flow control

[no drip][no mess][application][tube][cartridge][vial]

**Promotional Package Copy {The total will not exceed the Net Contents}**

One month [dose] free

One free month supply [dose] included

Bonus pack

Free [applicator][device][applicator device] [or] [tube][vial][cartridge][inside]

Designed not to drip when set on top of the counter, or table, or other flat surface.

For use with [brand] [applicator][device][applicator device]

[Applicator] [device][applicator device] not included {for refill packaging with only tubes/vials/cartridges}

[brand] Refill Pack [brand][applicator] [device][applicator device] not included

**Refill Claims**

For use [only] with [brand name][Applicator][device][applicator device]

([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses

Easy to use [convenient] refills

[Can be used with] [Use with] [Brand Name] [applicator][device][applicator device]

[Brand Name (e.g., Adams or Bio Spot, Smart Shield)] [Applicator][device][applicator device] [Refills][Refill Pack]

[Refill Pack] [for][Brand Name] [Applicator][device][applicator device]

[tube][cartridge][vial] refill pack

Refills [Refill Pack] available

[tube][cartridge][vial] design